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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 10 2002

at 1 o'clock and 15 min. P.M.  
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO.
	)	
Plaintiff,	)	
	)	
vs.	)	INDICTMENT
	)	
PATRICIA LEILANI BRUNSON,	)	[26 U.S.C. § 7206(2)]
	)	
Defendant.	)	
	)	

**CR 02-00124 DAE**

I N D I C T M E N T

The Grand Jury charges that:

COUNT 1

On or about April 15, 1996, in the District of Hawaii and elsewhere, the Defendant, PATRICIA LEILANI BRUNSON, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a U.S. Individual Income Tax Return, Form 1040, of Carl N. for the calendar year 1995, which was false and fraudulent as to one or more material matters, in that said tax return, among other

things, represented that Carl N. was entitled under the provisions of the Internal Revenue laws to claim deductions for medical and dental expenses of \$4,335, including medical premiums of \$2,957; deductions for gifts to charity by cash or check of \$1,614, including charitable contributions of \$624 to Religious (Christian), \$245 to Various Educational, \$25 to Leeward Youth Program, \$25 to Windward Youth Program, \$100 to YMCA: Young men's Christian Ass., \$100 to YWCA: Young Women's Christian Ass., \$50 to Second Chance (non profit), \$45 to Youth for Christ, \$25 to Hale Kipa Group Home, \$50 to American Lung Assoc, \$50 to Easter Seals, \$100 to Oahu Jaycees, \$75 Lyons Club, and \$50 to Boys and Girls Club; deductions for job expenses and other miscellaneous deductions of \$2,126, including \$615 for Work Attire, \$90 for Req. Covered Shoes, \$325 for Dry Cleaning (work attire), and \$516 for Dry Cleaning (Uniform/Coat); whereas as Defendant PATRICIA LEILANI BRUNSON then and there well knew and believed, Carl N. was not entitled to claim deductions for these items in the amounts stated in the return, but only lesser amounts.

All in violation of Title 26, United States Code, Section 7206(2).

COUNT 2

On or about April 15, 1996, in the District of Hawaii and elsewhere, the Defendant, PATRICIA LEILANI BRUNSON, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of

a U.S. Individual Income Tax Return, Form 1040, of Liane N. for the calendar year 1995, which was false and fraudulent as to one or more material matters, in that said tax return, among other things, represented that Liane N. was entitled under the provisions of the Internal Revenue laws to claim deductions for medical and dental expenses of \$7,841, including medical premiums of \$4,608; deductions for gifts to charity by cash or check of \$905, including charitable contributions of \$175 to Educational, \$50 to Various Community Non Profit Org., \$25 to Boys & Girls Club, \$25 to Habilitat, \$25 to American Heart Assoc., \$25 to Homeless Relief Fund, and \$45 to Easter Seals; deductions for job expenses and other miscellaneous deductions of \$2,136, including \$605 for Regulated Work Attire, \$250 for Dry Cleaning (work attire), and \$576 for Dry Cleaning (company uniform/coat); whereas as Defendant PATRICIA LEILANI BRUNSON then and there well knew and believed, Liane N. was not entitled to claim deductions for these items in the amounts stated in the return, but only lesser amounts.

All in violation of Title 26, United States Code, Section 7206(2).

COUNT 3

On or about April 15, 1996, in the District of Hawaii and elsewhere, the Defendant, PATRICIA LEILANI BRUNSON, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of a joint U.S. Individual Income Tax Return, Form 1040, of Bernardo L. and Carmelita L. for the calendar year 1995, which was false and fraudulent as to one or more material matters, in that said tax return, among other things, represented that Bernardo L. and Carmelita L. were entitled under the provisions of the Internal Revenue laws to claim deductions for medical and dental expenses of \$6,788, including medical premiums of \$5,820; deductions for gifts to charity by cash or check of \$1,336, including charitable contributions of \$250 to March of Dimes, \$60 to Aloha United Way, and \$150 to Educational Fundraisers; and deductions for job expenses and other miscellaneous deductions of \$2,131, including \$171 for Work Related Attire, \$480 for Uniform Dry Cleaning, and \$700 for job related supplies; whereas as Defendant PATRICIA LEILANI BRUNSON then and there well knew and believed, Bernardo L. and Carmelita L. were not entitled to claim

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deductions for these items in the amounts stated in the return,  
but only lesser amounts.


All in violation of Title 26, United States Code,  
Section 7206(2).

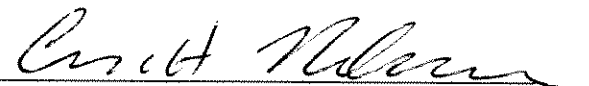
DATED: April 10, 2002, at Honolulu, Hawaii.

A TRUE BILL

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FOR PERSON, Grand Jury

EDWARD H. KUBO, JR.  
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UNITED STATES v. PATRICIA LEILANI BRUNSON.; Cr. No. \_\_\_\_\_;  
"INDICTMENT"